

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	
)	
KENNETH A. GROOMS, II,)	No: 4:19-CR-00116 JMB
)	
)	
Defendant.)	

**GOVERNMENT'S DISCLOSURE OF ARGUABLY SUPPRESSIBLE EVIDENCE
PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 12(b)(4)**

COMES NOW the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jennifer A. Winfield, Assistant United States Attorney for said District, and makes the following disclosure pursuant to Federal Rule of Criminal Procedure 12(b)(4).

At trial, the Government intends to use the evidence seized and statements made by the defendant and other witnesses during the events described below, and as described in the discovery letter provided to defense counsel on March 13, 2019. This evidence and these statements are more fully set forth in the investigative reports and interviews, which have been made available to defendant. The Government has listed the evidence below that it believes the defendant could possibly argue standing to contest, although the Government is in no way conceding that the defendant, in fact, has standing on these events.

- AT&T Records
- Restaurant Surveillance Video
- T-Mobile Records
- 302-Interview of Victim
- 302-Interview of E.Ba.
- 302-Interview of E.Be.
- 302-Interview of Restaurant Employee
- 302-Video Retrieval

- 302-K.W. Interview
- 302-Work Schedule for Kenneth Grooms
- GPS Records for Kenneth Grooms
- Human Resource Records for Kenneth Grooms
- IAD Records for Kenneth Grooms
- SLMPD Response Re: Info from Real Time Crime Center from cameras near Goodfellow Blvd/West Florissant
- Recorded Interview of K.W. and Kenneth Grooms

Also, as additional evidence is found, and as supplemental information comes to the Government's attention, the Government may choose to use evidence in addition to that listed above. Therefore, a supplemental Rule 12(b)(4) notice may be filed at a later date.

JEFFREY B. JENSEN
United States Attorney

/s/ Jennifer A. Winfield
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CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2019, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon counsel of record.

/s/ Jennifer A. Winfield
JENNIFER A. WINFIELD, #53350MO
Assistant United States Attorney